

# **EXHIBIT 2**

## Vicky Romanenko

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**From:** Steve Williams <SWilliams@cpmlegal.com>  
**Sent:** Monday, February 13, 2017 1:38 PM  
**To:** Esshaki, Gene J.  
**Cc:** Vicky Romanenko; Jackie Taylor; Emily Luthy; Millicent Lundburg; rlinkin@dwmrlaw.com; Ian A. Kanig; Hemlock, Adam; Ronnie Spiegel; Demetrius Lambrinos; AEllis@stblaw.com; Patrick.Carome@wilmerhale.com; Steven Cherry; klein@butzel.com; Asmedley@winston.com; Novison, Heather; Trey Nicoud; JAmato@winston.com; WShotzbarger@duanemorris.com; heather.choi@bakerbotts.com; Sloane Kuney Rosenthal; Evelyn Li; Jill S. Casselman; Bonk, Cameron; Bradley Love; Elliot.Weingarten@stblaw.com; Justina K. Sessions; Trager, Lara; Ciolino Dawn L.; Daniel Purcell; Raiter, Shawn; Burks, Laurie  
**Subject:** Re: Honda Objection

Your Honor

Serving parties are reviewing the materials provided by Ms. Romanenko and will provide our response.

Sent from my iPhone

On Feb 13, 2017, at 12:28 PM, Esshaki, Gene J. <[gjesshaki@abbottnicholson.com](mailto:gjesshaki@abbottnicholson.com)> wrote:

Can the parties work out a stipulated order to address the concerns of these third party dealers as suggested by Ms. Romanenko?

### Gene J. Esshaki

<image006.png> <image007.jpg> <image008.png>

<image009.jpg> <image010.jpg>

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We are not authorized to enter into any binding agreement on behalf of any of our clients. If this communication contains any settlement proposal, it is for discussion purposes only and does not constitute an offer on behalf of us or any of our clients, and cannot create a contract or legally binding agreement. Any settlement of any matter requires the signature of an authorized representative of our client (other than Abbott Nicholson, P.C.) on final definitive documents which have been approved in accordance with our client's procedures.

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**From:** Vicky Romanenko [<mailto:Vicky@cuneolaw.com>]  
**Sent:** Monday, February 13, 2017 12:33 PM  
**To:** Esshaki, Gene J.  
**Cc:** 'Jackie Taylor'; 'Emily Luthy'; 'Millicent Lundburg'; '[rlinkin@dwmlaw.com](mailto:rlinkin@dwmlaw.com)'; 'Ian A. Kanig'; 'Hemlock, Adam'; 'Ronnie Spiegel'; 'Demetrius Lambrinos'; 'Steve Williams'; '[AEllis@stblaw.com](mailto:AEllis@stblaw.com)'; '[Patrick.Carome@wilmerhale.com](mailto:Patrick.Carome@wilmerhale.com)'; 'Steven Cherry'; '[klein@butzel.com](mailto:klein@butzel.com)'; '[Asmedley@winston.com](mailto:Asmedley@winston.com)'; 'Novison, Heather'; 'Trey Nicoud'; '[JAmato@winston.com](mailto:JAmato@winston.com)'; '[WShotzbarger@duanemorris.com](mailto:WShotzbarger@duanemorris.com)'; '[heather.choi@bakerbotts.com](mailto:heather.choi@bakerbotts.com)'; 'Sloane Kuney Rosenthal'; Evelyn Li; 'Jill S. Casselman'; 'Bonk, Cameron'; 'Bradley Love'; '[Elliot.Weingarten@stblaw.com](mailto:Elliot.Weingarten@stblaw.com)'; 'Justina K. Sessions'; 'Trager, Lara'; 'Ciolino Dawn L.'; 'Daniel Purcell'; Raiter, Shawn; Burks, Laurie  
**Subject:** RE: Honda Objection

Dear Special Master Esshaki,

Re-attached to this email are the automobile dealership objections from third-party dealerships, to the production by Honda of Honda dealers' DMS data. We believe that these dealerships' concerns should be taken into account.

We believe that these dealers' data, if produced, should be ordered to be treated as Highly Confidential under the protective order, filed under seal, not provided to anyone outside the litigation, not used outside the litigation, and not shown to any other dealerships.

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**From:** Burks, Laurie [<mailto:lburks@larsonking.com>]  
**Sent:** Monday, January 30, 2017 1:11 PM  
**To:** '[gjesshaki@abbottnicholson.com](mailto:gjesshaki@abbottnicholson.com)'  
**Cc:** 'Jackie Taylor'; 'Emily Luthy'; 'Millicent Lundburg'; '[rlinkin@dwmlaw.com](mailto:rlinkin@dwmlaw.com)'; 'Ian A. Kanig'; 'Hemlock, Adam'; 'Ronnie Spiegel'; 'Demetrius Lambrinos'; 'Steve Williams'; '[AEllis@stblaw.com](mailto:AEllis@stblaw.com)'; '[Patrick.Carome@wilmerhale.com](mailto:Patrick.Carome@wilmerhale.com)'; 'Steven Cherry'; '[klein@butzel.com](mailto:klein@butzel.com)'; '[Asmedley@winston.com](mailto:Asmedley@winston.com)'; 'Novison, Heather'; 'Trey Nicoud'; '[JAmato@winston.com](mailto:JAmato@winston.com)'; '[WShotzbarger@duanemorris.com](mailto:WShotzbarger@duanemorris.com)'; '[heather.choi@bakerbotts.com](mailto:heather.choi@bakerbotts.com)'; 'Sloane Kuney Rosenthal'; Evelyn Li; Vicky Romanenko; 'Jill S. Casselman'; 'Bonk, Cameron'; 'Bradley Love'; '[Elliot.Weingarten@stblaw.com](mailto:Elliot.Weingarten@stblaw.com)'; 'Justina K. Sessions'; 'Trager, Lara'; 'Ciolino Dawn L.'; 'Daniel Purcell'; Raiter, Shawn  
**Subject:** Honda Objection

Dear Special Master Esshaki:

Enclosed you will find communication we received from the Waikem Honda dealer. We will file this via ECF in the MDL master file.

Best regards,

Shawn

<image011.png>

**SHAWN M.  
RAITER**

<image012.png><image013.png><image014.png>

**Larson • King, LLP**  
30 East Seventh  
Street • Suite 2800

<image015.png>

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